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January 28, 2002

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: **WT DOCKET NO. 99-168: SERVICE RULES FOR THE 746-806 MHZ BANDS AND REVISIONS TO PART 27 OF THE COMMISSIONS RULES**

Dear Secretary Salas:

ArrayComm, Inc. (hereinafter ArrayComm) hereby responds to the November 6, 2001, ex parte submission of the Private Radio Section (PRS) of the Telecommunications Industry Association's Wireless Communications Division in the above-referenced docket. ArrayComm respectfully requests that this letter be made a part of the record of the instant proceeding.

The main issue addressed in the November 6 filing was the degree of protection that public safety systems require from commercial systems operating on adjacent channels. ArrayComm asserts no special expertise on the particular level of protection such public safety systems need. Based on available information, this is a matter that the Commission must decide.

ArrayComm does believe, however, that the Commission has adopted the correct regulatory approach to out of band emissions (OOBE) from commercial operations in 746-806 MHz band and their impact on adjacent public safety bands. In particular, the Commission specified maximum permissible interference levels that commercial systems could generate in the public safety bands, based on those levels on the Commission's assessment of the operating requirements of public safety systems. Emissions levels within the commercial portions of the bands were specified in broad accordance with standard commercial practice, without presupposing any particular commercial technology. This approach provides a level of protection for public safety operations while preserving freedom of choice for commercial operators in deciding how best to provide that protection through choices in technology and deployment practices. On this critical issue, the Commission's approach seems to have been predicated on technical neutrality. ArrayComm heartily approves of this rationale.

Again, ArrayComm emphasizes that it expresses no opinion as to the efficacy of the specific protection values chosen. Whatever the Commission determines them to be, all systems operating on channels adjacent to public safety must comply, irrespective of the technology being utilized.

Pursuant to Section 1.1206 of the Commission's Rules, an electronic copy of this letter is being filed with your office.

Respectfully Submitted,

Randall S. Coleman
Vice President, Regulatory Affairs

cc: James Schlichting, Esq.
Stan Wiggins
William Belt, Private Radio Section, TIA